

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

**EDWARD CONSTANTINESCU, et al.,
Defendants.**

Case No. 22-CR-00612

Motion for a Hearing as to Determination of Counsel

The United States, by and through its undersigned counsel, hereby requests that the Court order Defendants Gary Deel, Thomas Cooperman, and Stefan Hrvatin (“Defendants”) to appear for a hearing to inquire about efforts to retain counsel in the above-referenced case. Such a hearing would serve the interests of justice and should be held as soon as practicable after January 3, 2022, given the intervening holidays.

On December 7, 2022, a grand jury in this District indicted Defendants for conspiracy to commit securities fraud and securities fraud. On December 13, 2022, Defendants were arrested and had their initial appearances. Defendants Cooperman and Deel had their initial appearances in the Central District of California. Defendant Hrvatin had his initial appearance in the Southern District of Florida. As of the date of this filing, no attorney for a Defendant has entered a notice of appearance in the above-referenced case.

A hearing for the Court to inquire about the Defendants’ efforts to secure counsel in this case would serve the interests of justice. The United States stands ready to produce discovery to Defendants – as well as the other indicted Defendants – in this case. Given the volume of the discovery, such productions should be produced to the counsel of record to avoid unnecessary

duplication of time and effort. Such a hearing would therefore serve the interests of justice by allowing this case to advance so it may be resolved on the merits.

For the foregoing reasons, the Court should grant this motion and set a hearing about Defendants' efforts to retain counsel in the above-referenced case. A proposed Order is attached.

Date: December 21, 2022

Respectfully submitted,

ALAMDAR S. HAMDANI
United States Attorney,
Southern District of Texas

By: s/ Thomas H. Carter
Thomas H. Carter
Assistant United States Attorney
State Bar Nos.: TX24048387
1000 Louisiana Street, 25th Floor
Houston, Texas 77002
Tel.: (713) 567-9470

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ORDER

HAVING CONSIDERED the Government's Motion for a Hearing as to Determination of Counsel, the COURT ORDERS a hearing on the matter set for January _____, 2023 at _____AM/PM and for Defendants Cooperman, Deel, and Hrvatin to attend.

Signed at Houston, Texas this the _____ day of _____, 2022.

The HON. ANDREW S. HANEN
UNITED STATES MAGISTRATE JUDGE